

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



November 4, 2009

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Astronaut Memorial Foundation Annual Board of Directors Dinner, November 13, 2009

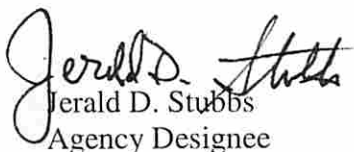
The Astronauts Memorial Foundation (AMF), a non-profit 501(c)(3) organization, is hosting its Ninth Annual Board of Directors Dinner on November 13, 2009, at the Eau Gallie Yacht Club in Indian Harbour Beach, Florida. The dinner is held to honor members of the Board of Directors whose terms have expired.

Approximately 50 to 55 guests will attend the dinner. Guests will include representatives of state, local, and Federal government, the media, academia, and the aerospace industry. The cost of the event is \$65 per person.

I have determined that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. Attendees will have the opportunity to disseminate information on NASA's ongoing programs and activities and discuss matters of interest with fellow guests.

Accordingly, NASA employees whose duties do not substantially affect any of the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under the Executive Order 13490, may accept an invitation for free attendance at the event for themselves and a guest. NASA employees whose duties may substantially affect AMF, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from the Chief Counsel's Office.

Finally, AMF's invitation extends to employees and their guests. Because this is an event where attendees will generally be accompanied by a spouse or other guest, employees are authorized to accept free attendance for themselves and their guest.


Gerald D. Stubbs
Agency Designee

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